

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

---

In re: Chapter 7 No. HG-10-01379  
Terry Lee Atkin Sr. Hon. Jeffrey R. Hughes  
Debtor.  
\_\_\_\_\_ /

**NOTICE OF MOTION AND OPPORTUNITY FOR HEARING**

Mortgage Electronic Registration Systems, Inc., as nominee for lender and lender's successors and/or assigns with GMAC Mortgage as servicer for lender has filed papers with the court to seek relief from the automatic stay.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may want to consult one.)**

If you do not want the Court to grant the relief requested, or if you want the Court to consider your views on the Motion, within fourteen (14) days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position, at the United States Bankruptcy Court, One Division Ave., N.W. Room 200, Grand Rapids, MI 49503.<sup>1</sup> If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

James W. Batchelor (P25500), 31440 Northwestern Highway, Suite 200, Farmington Hills, MI 48334-2525, 248.642.2515

John A. Porter, 6059 Cannon Highlands Drive NE, Belmont, MI 49306

Daniel McDermott, 125 Ottawa Ave NW Ste 200R, Grand Rapids, MI 49503-2837

2. If a response or answer is timely filed, the Clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.**

Respectfully Submitted,  
Trott & Trott, P.C.

Dated: April 15, 2010

/S/ James W. Batchelor (P25500)  
/S/ Shawn C. Drummond (P58471)  
/S/ Adam Reatherford (P70827)  
Attorney for Mortgage Electronic Registration  
Systems, Inc., as nominee for lender and lender's  
successors and/or assigns with GMAC Mortgage as  
servicer for lender  
31440 Northwestern Highway, Suite 200  
Farmington Hills, MI 48334-2525  
248.642.2515  
Email: WesternECF@trottlaw.com

TROTT & TROTT, P.C.  
31440 NORTHWESTERN  
HIGHWAY, SUITE 200  
FARMINGTON HILLS, MI  
48334-2525  
PHONE 248.642.2515<

<sup>1</sup>Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e).

**TROTT & TROTT, P.C.**  
31440 NORTHWESTERN  
HIGHWAY, SUITE 200  
FARMINGTON HILLS, MI  
48334-2525  
PHONE 248.642.2515<